

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

Criminal No. 3:22-cr-145

United States of America,

Plaintiff,

vs.

ANDEUS LAMAR SMITH,

Defendant.

**MOTION FOR
RELEASE**

Andeus Smith's sentencing hearing is scheduled for September 19, 2025.¹ He's been incarcerated pretrial since April 25, 2022—some 1,194 days.² Given this significant amount of time, and for other reasons to be discussed at an in-person hearing,³ Andeus requests the Court release him from custody.

Before filing this motion, counsel for Andeus spoke with the government, through Assistant United States Attorneys Jake Rodenbiker and Matt Kopp, and they indicated the government objects to this motion.

¹ Doc. 63.

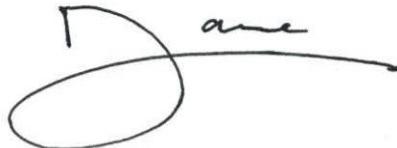
² Docs. 3, 5.

³ These reasons satisfy the requirement to reopen detention hearings under 18 U.S.C. § 3142(f)(2)(b).

For these reasons, Andeus Smith requests that the Court: (1) reopen his detention hearing; (2) schedule a detention rehearing; and (3) release him from pretrial custody.

Dated: July 31, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane DeKrey". The signature is fluid and cursive, with a large, stylized 'D' on the left and the name "dane" written in a smaller, more standard script to the right.

Dane DeKrey (#09524)
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